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PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§ Chapter 11
ERG Intermediate Holdings, LLC, <i>et al.</i> , <sup>1</sup>	§ Jointly Administered
Debtors.	§ Case No.: 15-31858-hdh-11

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**DEBTORS' WITNESS LIST**

The Debtors submit the following witness list in connection with the hearing on June 9, 2015 on the Debtors' Motion for Entry of an Order (I) Authorizing the Retention and Employment of AP Services, LLC and (II) Designating Rebecca A. Roof as Chief Restructuring Officer Nunc Pro Tunc to April 30, 2015 (the "AP Services Application") [Docket No. 79]:

<b>Witness No.</b>	<b>Witness</b>
1.	Rebecca A. Roof, Chief Restructuring Officer of ERG Intermediate Holdings, LLC, <u>et al.</u>
2.	R. Kelly Plato, sole manager of each of the Debtors and Chief Financial Officer of ERG Resources, L.L.C.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

Dated: June 5, 2015  
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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